

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DAVID PERROTTI,

Plaintiff,

v.

PENNSYLVANIA STATE EDUCATION
ASSOCIATION; ABINGTON HEIGHTS
EDUCATION ASSOCIATION,

Defendants.

Case No. 1:21-cv-01132-SHR

(Hon. Sylvia H. Rambo)

--ELECTRONICALLY FILED--

**PLAINTIFF'S NOTICE OF
VOLUNTARY DISMISSAL**

TO THE HONORABLE COURT:

AND NOW, this 8th day of September, 2021, Plaintiff David Perrotti files this Notice of Voluntary Dismissal pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, and respectfully states as follows in support thereof:

1. Plaintiff filed this action on June 25, 2021, alleging claims and seeking relief against Defendants Pennsylvania State Education Association and Abington Heights Education Association.
2. Pursuant to Rule 41(a)(1)(A)(i), a plaintiff may voluntarily dismiss an action against a defendant without a court order by filing a notice of dismissal before the opposing parties have served either an answer or a motion for summary judgment. No defendant hereto has served an answer or a motion for summary judgment in this matter.

3. As the parties have reached a settlement in this matter, Plaintiff voluntarily dismisses this action in its entirety by the filing of this Notice of Voluntary Dismissal.

4. Accordingly, this Notice constitutes, without further order of the Court, the dismissal of the above-captioned action with prejudice.

Respectfully submitted,

Dated: September 8, 2021

By: s/ Danielle R. Acker Susanj
Danielle R. Acker Susanj
PA316208
E-mail: drasusanj@fairnesscenter.org
Nathan J. McGrath
PA308845
E-mail: njmcgrath@fairnesscenter.org
THE FAIRNESS CENTER
500 North Third Street, Suite 600B
Harrisburg, Pennsylvania 17101
Telephone: 844.293.1001
Facsimile: 717.307.3424

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, the undersigned, certify that on this date I electronically filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will send electronic notification of said filing to all counsel of record in this matter who are ECF participants.

Dated: September 8, 2021

By: s/ Danielle R. Acker Susanj
Danielle R. Acker Susanj
PA316208
E-mail: drasusanj@fairnesscenter.org
THE FAIRNESS CENTER
500 North Third Street, Suite 600B
Harrisburg, Pennsylvania 17101
Telephone: 844.293.1001
Facsimile: 717.307.3424

Attorney for Plaintiff